

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:) **Bankruptcy No. 15-22497 GLT**
Kathleen Miskovich,)
Debtor,) **Chapter 13**
Ditech Financial LLC,)
Movant,)
vs.)
Kathleen Miskovich and) **Related to Claim No. 3**
Ronda J. Winnecour, Chapter 13 trustee
Respondents.

DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT

AND NOW, comes the Debtor, Kathleen Miskovich, by and through her attorneys,
CALAIARO VALENCIK and David Z. Valencik, and presents the following:

1. This case was originally filed on July 9, 2015.
2. A notice of mortgage payment change was filed with the Court by Ditech Financial LLC on March 25, 2019.
3. This notice raises the escrow portion of the monthly mortgage payment \$4.40 per month.
4. The Court has a standing rule that requires the Debtor to file, either:
 - (1) an AMENDED CHAPTER 13 PLAN;
 - (2) a DECLARATION that the existing Chapter 13 Plan is sufficient to fund the Plan with the modified debt; or
 - (3) an OBJECTION to the Notice of Mortgage Payment Change as stated.
5. There is no reason to amend the Debtor's Chapter 13 Plan.

6. The existing confirmed plan is over-funded so there is no reason to amend the plan.

Respectfully submitted,

Dated: April 15, 2019

BY: /s/ Donald R. Calaiaro
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BY: /s/ David Z. Valencik
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**CERTIFICATE OF SERVICE OF SERVICE OF DECLARATION THAT THE
EXISTING CHAPTER 13 PLAN IS SUFFICIENT**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on April 15, 2019.

Service by First Class Mail:

Kathleen Miskovich, 1219 Applewood Drive Gibsonia, PA 15044

Service by email and/or NEF:

Reyna Cordova Ditech Financial LLC PO Box 6154 Rapid City, SD 57709
poc.team@ditech.com, James Warmbrodt JWarmbrodt@kmlawgroup.com
Office of the U.S. Trustee, 1001 Liberty Avenue, Liberty Center, Suite 970, Pittsburgh, PA 15222
Ronda J. Winnecour, Chapter 13 Trustee receives service electronically through the CM/ECF System at
cmecf@chapter13trusteedpa.com

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: First Class Mail or Electronic Notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: 04/15/19

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